

**- E X H I B I T A -**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X Index No.  
JUDY ANNE GALLAGHER,

Plaintiff(s),

**SUMMONS**

-against-

Plaintiff designates  
Bronx County as the  
place for trial.

THE STOP & SHOP SUPERMARKET  
COMPANY LLC,

The basis of venue is  
Plaintiff's residence.

Defendant(s).

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**TO THE ABOVE NAMED DEFENDANT:**

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on Plaintiff's Attorneys within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to answer or appear, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: BRONX, NEW YORK  
April 28, 2022

KOHN LAW FIRM  
Attorneys for Plaintiff  
1200 Morris Park Avenue  
Bronx, New York 10461  
(718) 409-1200

TO: THE STOP & SHOP SUPERMARKET COMPANY LLC,  
C/O SECRETARY OF STATE

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X Index No.

JUDY ANNE GALLAGHER,

Plaintiff(s),

**VERIFIED COMPLAINT**

-against-

THE STOP & SHOP SUPERMARKET  
COMPANY LLC,

Defendant(s).

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Plaintiff, JUDY ANNE GALLAGHER, by her attorneys, KOHN  
LAW FIRM, as and for her Verified Complaint respectfully alleges  
the following upon information and belief:

1. That Plaintiff JUDY ANNE GALLAGHER (hereinafter  
"GALLAGHER") was and still is a resident of the State of New York,  
County of Bronx.

2. That Defendant THE STOP & SHOP SUPERMARKET COMPANY LLC  
(hereinafter "STOP & SHOP.") was and still is a foreign limited  
liability company duly authorized to conduct business within the  
State of New York.

3. Plaintiff repeats, reiterates, realleges each and every  
allegation contained within the preceding paragraphs with the same  
force and effect as if fully set forth herein at length.

4. That on or about April 8, 2022 Plaintiff was lawfully on or about the premises known as 1720 Eastchester Road, Bronx, New York (hereinafter "subject premises").

5. That Defendant owns, operates, maintains, leases, and/or rents the subject premises.

6. That on or prior to April 8, 2022 the Defendant disregarding its duty negligently and carelessly permitted the subject premises to become and remain in an unsafe and dangerous condition and maintained same improperly creating a dangerous condition.

7. That on or prior to April 8, 2022 the Defendant created an unsafe and dangerous condition upon the subject premises.

8. That on or about April 8, 2022, Plaintiff was lawfully on and about the subject premises and due solely and only to the negligence of the Defendant in failing to keep and maintain the area in a safe and proper condition, as set forth herein, Plaintiff was caused to trip and fall at or about the defective area of the subject premises and sustain injuries.

9. That by virtue of the negligence of the Defendant Plaintiff suffered and sustained injuries.

10. That there is a duty incumbent upon the Defendant to maintain its property, courtyards, means of egress and ingress, hallways, aisles and walkways within its jurisdiction in a safe and proper condition so that such condition would not be dangerous to those persons lawfully upon them.

11. That Defendant had actual and/or constructive notice of the defect prior to the incident set forth herein.

12. That as a result of the aforesaid negligent acts of the Defendant, Plaintiff sustained serious, severe, and, grievous injuries, which rendered plaintiff sick, sore, lame, and disabled and has damaged the Plaintiff.

**WHEREFORE**, Plaintiff respectfully prays for Judgment on together with costs and disbursements.

Dated: BRONX, NEW YORK  
April 28, 2022

KOHN LAW FIRM  
*Attorneys for Plaintiff*  
1200 Morris Park Avenue  
Bronx, New York 10461  
(718) 409-1200

VERIFICATION

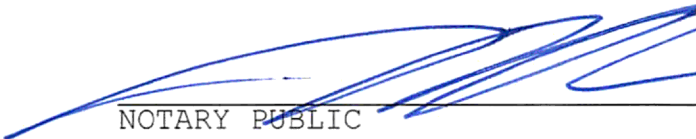
STATE OF NEW YORK        }  
                                      }  
COUNTY OF BRONX        }       ss:

JUDY AWE CAULFIELD being duly sworn, deposes and says;

1. The Deponent is the Plaintiff in the within action;
2. Deponent has read the foregoing Summons and Verified Complaint, and knows the contents thereof; and that the same true to Deponent's own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters the Deponent believes same to be true.



Sworn to before me this  
28 day of APRIL, 2022

  
NOTARY PUBLIC

